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**BAYRAMOGLU LAW OFFICES LLC**

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*Attorneys for Plaintiff*

## Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**WINNER'S SUN PLASTIC &  
ELECTRONIC'S (SHENZHEN) CO. LTD., a  
Chinese Limited Company.**

**Plaintiff,**

vs.

Case No.: 2:19-cv-00852-GMN-EJY

**THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A"**

### Defendants.

**AMENDED STIPULATION TO DISMISS  
DEFENDANT IGENIO WITH  
PREJUDICE**

IGENIO, LTD,

## Counter-Claimant.

VS

WINNER'S SUN PLASTIC & ELECTRONIC  
(SHENZHEN) CO. LTD., a Chinese Limited  
Company.

## Counter-Defendant

**AMENDED STIPULATION TO DISMISS DEFENDANT JENIO WITH PRE-JUDICE**

Pursuant to the Court's May 12, 2020 (Order ECF 63) WINNER'S SUN PLASTIC & ELECTRONIC'S (SHENZHEN) CO. LTD., a Chinese Limited Company, (hereinafter "Winner") and Defendant IGENIO (hereinafter "Igenio"), a company based in the United Kingdom, previously filed a stipulation to dismiss iGenio with prejudice on June 16, 2020.

However, the parties failed to specify whether the parties would bear their own fees. Pursuant to the Court's June 17, 2020 Minute Order the parties now clarify that each party is to bear its own fees and costs.

This dismissal is as to defendant Igenio *only*. Nothing in this Dismissal relates to any of the remaining Defendants.

This dismissal shall also serve as a dismissal of Igenio's counterclaims against Winner, again, each party shall bear its own fees and costs in relation to the counterclaims as well.

## CONCLUSION

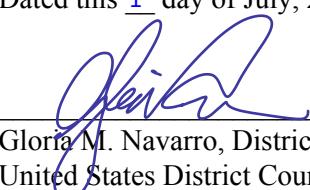
Winner and Igenio jointly request that the case be dismissed with prejudice as to defendant Igenio and a dismissal of the counterclaims against Winner, and that each party be ordered to bear its own fees and costs.

DATED AND SIGNED this 30<sup>th</sup> day of June, 2020

### IT IS SO ORDERED.

**IT IS FURTHER ORDERED** that Winner and Igenio's Stipulation of Dismissal with prejudice, (ECF No. 67), is **DENIED** as moot.

Dated this 1 day of July, 2020.

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
United States District Court

### BAYRAMOGLU LAW OFFICES LLC.

By: /s/ Nihat Deniz Bayramoglu  
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By: /s/ Robin Diann Shofner  
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(Nevada. Bar No. 13758)  
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Sacramento, CA 95811  
*Attorneys for Defendant Igenio*

### AMENDED STIPULATION TO DISMISS DEFENDANT IGENIO WITH PREJUDICE

1  
2                   **CERTIFICATE OF SERVICE**  
3  
4

5  
6     I hereby certify that I served this document pursuant to Rule 5 and the Court's CM/ECF  
7 system which electronically serves all parties and counsel who have appeared in this action and  
8 that have consented to electronic service, including at least:  
9  
10

11  
12                   **James W King**  
13                   Law Office of James W. King  
14                   844 East Sahara Avenue  
15                   Las Vegas, NV 89104  
16                   702-894-5399  
17                   Email: jkparkcity@gmail.com

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18  
19                   **Robin Diann Shofner**  
20                   MOLSBY & BORDNER, LLP  
21                   1830 15th St., Ste. 100  
22                   Sacramento, CA 95811  
23                   916-447-0529  
24                   Email: shofner@mobolaw.com  
25

26  
27     I declare under penalty of perjury that the information in this Certificate of Service is true  
28 and correct.  
29  
30

31     Dated June 30, 2020

32                   */s/ Nihat Deniz Bayramoglu*  
33                   Nihat Deniz Bayramoglu, Esq.

34  
35                   **AMENDED STIPULATION TO DISMISS DEFENDANT IGENIO WITH PREJUDICE**

## **SIGNATURE CERTIFICATION**

I hereby certify that the content of this document is acceptable to Robin Diann Shofner, counsel for Igenio, and that I have obtained the authorization of Ms. Shofner to affix her electronic signature to this document.

Dated June 30, 2020

/s/ Nihat Deniz Bayramoglu  
Nihat Deniz Bayramoglu, Esq.

**AMENDED STIPULATION TO DISMISS DEFENDANT IGENIO WITH PRE-JUDICE**